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VIA ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square, Room 430
New York, NY 10007

Re: *Students Against Antisemitism, Inc., et al. v. Trustees of Columbia University in the City of New York, et al.*, No. 1:24-cv-01306-VSB-SN (S.D.N.Y.)

Dear Judge Netburn:

Pursuant to Your Honor's Order of yesterday's date, *see* ECF 50, Defendant Trustees of Columbia University in the City of New York ("Columbia") respectfully requests an additional five pages for its brief in support of its forthcoming motion to dismiss the First Amended Complaint ("FAC"), for a total of 45 pages, instead of 40 pages. Of course, we would consent to an equivalent page extension for Plaintiffs' opposition brief.

The reason for our request is as follows: a substantial (if not overwhelming) number of the allegations in the FAC relate to Columbia, its community members, and its actions, in contrast to the other defendant, Barnard College ("Barnard"). More specifically, 27 of the 36 individual Plaintiffs and 7 of the 11 anonymous members of the organizational Plaintiffs in the FAC are Columbia students or alumni rather than affiliated with Barnard. Similarly, Columbia and its schools are mentioned no fewer than 1,197 times in the FAC, as compared to just 224 specific mentions of Barnard College. Columbia and Barnard, of course, are two distinct institutions with different boards, different presidents, different administrators, and different policies. *See* FAC, ECF 39, ¶¶ 65, 80-97. Yet Columbia has been allotted the same number of pages as Barnard.

An extension to 45 pages would be consistent with the extension granted by Judge Preska in another case raising similar claims against New York University ("NYU"). Plaintiffs in the NYU case are represented by the same counsel as Plaintiffs here. *See* Stip. & Order for Briefing Sched., *Ingber v. NYU*, No. 23 Civ. 10023 (S.D.N.Y. Mar. 13, 2024), ECF 34. The operative complaint in *NYU* spanned only 104 pages and 331 paragraphs (compared to 234 pages and 735 paragraphs here), identified only eight NYU students as named plaintiffs or anonymous organizational members (compared to 34 Columbia students or alumni here), and brought only six causes of action (compared to eight causes of action here, including the unprecedented claim

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alleging that Columbia was somehow part of a KKK Act of 1871 conspiracy). *Compare* Am. Compl., *Ingber*, No. 23 Civ. 10023 (S.D.N.Y. Jan. 31, 2024), ECF 25, *with* ECF 39. In *NYU*, Judge Preska agreed to give NYU 45 pages in connection with its motion to dismiss.

A modest extension of another five pages will allow Columbia to better develop its arguments for dismissal in an efficient manner. If Columbia's request is granted, the parties further request that Plaintiffs be given an additional five pages for any brief in opposition to Columbia's motion or for any omnibus brief in opposition to both Defendants' motions. Plaintiffs consent to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Roberta', with a stylized flourish extending to the right.

Roberta A. Kaplan